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11 Attorney for Nikoli Adrian Almeida

12 UNITED STATES DISTRICT COURT  
13 DISTRICT OF NEVADA

14 United States of America,

15 Plaintiff,

16 v.

17 Nikoli Adrian Almeida,

18 Defendant.

Case No. 2:24-mj-00131-MDC-1

**Stipulation and Proposed Order**

19 Mr. Almeida was charged by criminal information on February 8, 2024, with  
20 three counts: **(1)** Operating a Motor Vehicle while Under the Influence of Alcohol (a  
21 violation of 36 C.F.R. § 4.23(a)(1)); **(2)** Operating a Motor Vehicle with a BAC of 0.08  
22 Grams and Higher (a violation of 36 C.F.R. § 4.23(a)(2)); **(3)** Speeding (a violation of  
23 36 C.F.R. § 4.21(c)). (ECF No. 1.)

24 Mr. Almeida entered a plea agreement. (ECF No. 10.) Under that agreement,  
25 Mr. Almeida pleaded guilty to Count One. (ECF No. 10.) Counts Two and Three were  
26 dismissed. (*Id.*) Mr. Almeida was sentenced on Count One as follows:

27 One-year term of Unsupervised Probation with special  
conditions:

1. \$500.00 Fine and \$10.00 Mandatory Penalty Assessment;
2. Attend/ Complete the Lower Court Counseling's DUI Course and Victim Impact Panel;
3. Attend/ Complete an Eight (8) hour online alcohol awareness course;
4. The Defendant not return to Lake Mead National Recreation Area for a period of one (1) year; and
5. Defendant must not violate any local, state, or federal laws.

Should Defendant complete conditions 1, 2, 3, and 4 of unsupervised probation within one (1) year, and has not violated any local, state, or federal laws during that time, the parties agree to jointly move to allow the Defendant to withdraw his guilty plea to Count One. Government will move to amend Count One to a charge of Reckless Driving. The parties will jointly request that the original sentence be applied to the Reckless Driving conviction.

(*Id.*)

Mr. Almeida has completed the special conditions of his unsupervised probation in accordance with his plea agreement and sentence. Accordingly, the parties agree that Count One should be amended to Reckless Driving.

Dated: July 8, 2025

Respectfully submitted,

Rene L. Valladares  
Federal Public Defender

Sigal Chattah  
United States Attorney

/s/ Martin A. Novillo

/s/ Skyler H. Pearson

Martin A. Novillo  
Assistant Federal Public Defender

Skyler H. Pearson  
Assistant United States Attorney

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

United States of America,

Plaintiff,

v.

Nikoli Adrian Almeida,

Defendant.

Case No. 2:24-mj-00131-MDC-1

**[Proposed] Order**

The Court finds that Mr. Almeida has completed the special conditions of his unsupervised probation in accordance with his plea agreement and sentence.

IT IS THEREFORE ORDERED that Mr. Almeida is permitted to withdraw his guilty plea to Count One: Operating a Motor Vehicle Under the Influence.

IT IS FURTHER ORDERED that the Court, consistent with the plea agreement and sentence, enters a plea of guilty to Amended Count One: Reckless Driving.

DATED: 7-11-25

UNITED STATES MAGISTRATE JUDGE

